

JAMES J. LEE  
Nevada Bar No. 1909  
Email: [james@leelitigate.com](mailto:james@leelitigate.com)  
Legal Offices of James J. Lee  
2620 Regatta Dr., Suite 102  
Las Vegas, Nevada 89128  
\*\*\*  
900 W. Broadway St. Suite 920  
San Diego, CA 92110  
Cell: 702-521-4377  
Ofc: 702-664-6545  
Fax: 702-946-1115

*Attorney for Plaintiff Ciara Williams*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

CIARA WILLIAMS, an individual,  
  
Plaintiff,

vs.

SILVINO HINOJOSA, TOPGOLF USA LAS  
VEGAS, LLC, TOPGOLF INTERNATIONAL,  
INC. d/b/a TOPGOLF ENTERTAINMENT  
GROUP, DOES I through X, inclusive, and  
ROES I through X, inclusive,

Defendants.

2:20-cv-01871-RFB-NJK

Case No. ~~2:19-cv-00477-CJC-FEM~~

**STIPULATION AND ORDER  
TO EXTEND DEADLINE FOR  
PLAINTIFF'S REPLY IN  
SUPPORT OF MOTION TO  
REMAND**

**(First Request)**

Plaintiff Ciara Williams ("Plaintiff") and Defendant TopGolf USA Las Vegas, LLC. ("TopGolf"), through their respective attorneys, hereby agree and stipulate to extend Plaintiff's time to file her reply in support of her November 10, 2020 Motion to Remand to State Court. ("Motion") (ECF No. 14). TopGolf filed its Opposition to Plaintiff's Motion on November 20, 2020 (ECF No. 19). The deadline for Plaintiff's Reply is currently November 27, 2020 and

would be extended to November 30, 2020. This is the first request for such an extension. The request is made due to the Thanksgiving holiday, in good faith, and not to cause delay, pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1.

DATED this 24th day of November, 2020.

LEGAL OFFICES OF JAMES J. LEE

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

/s/ James J. Lee

/s/ Erica J. Chee

James J. Lee, Esq.  
Nevada Bar No. 1909  
2620 Regatta Drive #102  
Las Vegas, NV 89128  
*Attorneys for Plaintiff*

Erica J. Chee  
Nevada Bar No. 12238  
Suzanne L. Martin  
Nevada Bar No. 8833  
Wells Fargo Tower  
Suite 1500  
3800 Howard Hughes Parkway  
Las Vegas, NV 89169  
*Attorneys for Defendant*  
*TopGolf USA Las Vegas, LLC*

IT IS SO ORDERED.

IT IS SO ORDERED:



RICHARD F. BOULWARE, II  
United States District Judge

DATED this 30th day of November, 2020.

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically transmitted the foregoing **STIPULATION TO EXTEND DEADLINE FOR PLAINTIFF'S REPLY IN SUPPORT OF MOTION TO REMAND** to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Suzanne Martin  
Erica Chee

Pursuant to FRCP 5(b), I hereby further certify that service of the foregoing was made on November 25, 2020 by depositing a true and correct copy of same for mailing, first-class mail, postage prepaid thereon, at Las Vegas, Nevada, addressed to the following:

Silvino Hinojosa, ID #01722886  
Clark County Detention Center  
330 S. Casino Center Boulevard  
Las Vegas, NV 89101-6102  
*Defendant in pro se*

DATED this 25<sup>th</sup> day of November, 2020.

/s/ Isabella Lee  
An employee of Legal Offices of James J. Lee